

## **REMARKS**

Applicants request favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-2, 4, 5, 8, 10-14, 16, 17, and 20-22, 24-28, 30-33, 35, and 36 are pending in this application, with Claims 1, 13, 27, and 32 being independent.

Claims 13, 26, and 32 have been amended. Applicants submit that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

### *Statement of Substance of Interview*

Applicants appreciate the courtesies extended by Examiner Nguyen in granting the telephonic interview that was conducted on May 14, 2008.

During the interview, Applicants' representative explained how the currently pending claims distinguish over the combination of Kondoh et al. (U.S. Patent 6,968,058) and Kobayashi et al. (U.S. Patent 7,124,094), which is the basis of the outstanding rejection.

In particular, Applicants' representative explained that Claim 1, for example, includes the features of an image generation device having a first verification data generation unit which generates first verification data from image data using a common key in common key cryptography, and a first image verification device that includes a second verification data generation unit which generates second verification data from the image data using a private key in public key cryptography without editing the image data, if it is verified using the image data, the first verification data, and the common key that the image data is not altered. As Applicants' representative explained, this combination of features allows the image generation device to

generate the first verification data without the need for the complex, time-consuming processing needed for public key cryptography, while a first image verification device can then generate second verification data using the more secure public key cryptography, without editing the image data, if it is verified using the first verification data that the image data is not altered.

In contrast, *Kondoh et al.* discloses only public key cryptography and not the use of common key cryptography and public key cryptography. Further, that patent discloses generating data MD from image data and generating a MAC by encrypting the MD using a private key, and then, if the image is not altered, editing the image by a user, generating data MD2 based on the image file after editing and the editing history, and generating MAC2 by encrypting the MD2 data using a private key. (See, e.g., column 10, lines 29-61.) Thus, that patent also does not disclose or suggest generating second verification data using a private key without editing the image data, if a first verification unit verifies that the image data is not altered.

Further, Applicants' representative pointed out that *Kobayashi et al.* does not remedy these deficiencies of *Kondoh et al.* because *Kobayashi et al.* also does not disclose generating second verification data using a private key without editing the image data.

Moreover, Applicants' representative suggested that one skilled in the art would not combine the references in the manner suggested in the previous Office Action. In particular, the Office Action proposes substituting the use of common key cryptography as disclosed in *Kobayashi et al.* for the use of public key cryptography used in *Kondoh et al.* However, as pointed out by Applicants' representative, *Kondoh et al.* is extremely concerned with maintaining secrecy of the encryption key and states that this key "must never leak to third parties including the camera user." (Col. 5, lines 45-52.) Accordingly, Applicants submit that

one skilled in the art would not replace the very secure public key encryption used in *Kondoh et al.* with the less secure common key cryptography mentioned in *Kobayashi et al.*, since this would require the distribution of the common key.

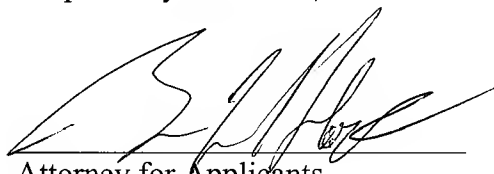
For the foregoing reasons, Applicants submit that the present invention recited in independent Claim 1 is patentable over the art of record, whether that art is considered individually or taken in combination. The other independent claims recite features similar to those of Claim 1 discussed above and are believed patentable for similar reasons.

The dependent claims are patentable for at least the same reasons as the independent claims, as well as for the additional features they recite.

In view of the foregoing, Applicants submit that the present application is in condition for allowance. An early Notice of Allowance is requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. L. Klock', is written over a horizontal line.

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